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*Whewell*, 122 Wis. 33, 99 N. W. 599, which decided the precise point herein involved as the court has in the principal case. The majority of the courts have, however, inclined to sustain similar actions on the principle of comity. In an action by the same receiver and for the same purpose as that in the principal case, the Massachusetts court sustained the action. *Converse v. Ayer*, 197 Mass. 443, 84 N. E. 98. VANN, J., in giving the opinion of the court in *Howarth v. Angle*, 162 N. Y. 179, says, "When an action by a foreign receiver to collect assets, under the authority of the court which appointed him, works no detriment to any citizen of this state, and is not repugnant to its policy, it would be a provincial and narrow view for our courts to refuse to extend the usual state comity." In a case where the statute confers a right upon a receiver, as quasi assignee, and representative of the creditors, and as such vested with authority to maintain an action, the receiver may sue in a foreign jurisdiction. *Bernheimer v. Converse*, 206 U. S. 516, 27 Sup. Ct. 755, 51 L. Ed. 1163. For other similar holdings, see *Guernsey v. Moore*, 131 Mo. 650; *Aultman's Appeal*, 98 Pa. St. 505; *Flash v. Conn*, 109 U. S. 371; *Howarth v. Lombard*, 175 Mass. 570, 56 N. E. 888.

DAMAGES—FOR INTERFERENCE WITH EMPLOYMENT—MENTAL SUFFERING AN ELEMENT.—Plaintiff, refused admission to a union, is maliciously kept out of employment by the defendants, who procure his discharge through the threat of strikes upon his employers and through fear of bodily injury to himself. In an action in tort against the defendants, the walking delegate et al., for the torts to plaintiff's person and for malicious interference with his means of livelihood, *held*, his trade and the contracts by which he is employed are in the nature of property, therefore he is entitled to damages for mental suffering caused by the malicious interference with this property, in addition to damages for his pecuniary loss. *Carter v. Oster* (1908), — Mo. App. —, 112 S. W. 995.

Third parties are liable for inducing breaches of contract by unlawful methods. *Lumley v. Gye*, 2 El. & Bl. 216; *Angle v. Chi., St. P., etc., Ry.*, 151 U. S. 1; *Moran v. Dunphy*, 177 Mass. 485. A conspiracy to deprive one of the benefit of a contract with another is unlawful. *Garst v. Charles*, 187 Mass. 144. Interference with one's employment amounting to intimidation gives a right of action for damages. *O'Neil v. Behanna*, 182 Pa. St. 236. The general rule seems to be that in the absence of statute, mental suffering is only the subject of damages when connected with bodily injury. *Connell v. West. Union Tel. Co.*, 116 Mo. 34; *Pittsburg C. C. & St. L. v. Story*, 63 Ill. App. 239; *Chicago v. McLean*, 133 Ill. 148; *Shellabarger v. Morris*, 115 Mo. App. 566; *Beaulieu v. Great Northern*, 103 Minn. 47. The decision in the principal case is based on the principle of *Moyer v. Gordon*, 113 Ind. 282, and *Fillebroezen v. Hoar*, 124 Mass. 580, where in the case of wrongful eviction and malicious interference with property, damages for mental suffering were allowed.

DEDICATION — ACCEPTANCE — ORDINANCE FIXING GRADE.—A street was dedicated to the defendant city. In 1899 the defendant adopted an ordinance establishing the grade of several streets, among them this street. An owner